

Exhibit B

STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

DECLARATION OF SEAN FLAMMER

BEFORE ME, the undersigned authority, on this date personally appeared Sean Flammer, who being by me first duly sworn, did depose on his oath and state as follows:

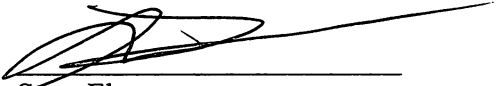
1. My name is Sean Flammer. I am over the age of eighteen, of sound mind, and am in all ways competent to make this affidavit. The facts stated herein are based upon my personal knowledge and are true and correct.
2. I am an attorney at Edwards Law.
3. I deposed a UTMB agency representative on May 30, 2014 following the Court's May 29th hearing setting the deposition.
4. The fees and expenses associated with the deposition on May 30 are the following:

a. Time:	12.9 hours	x	\$350/hr	=	\$ 4515.00
b. Court reporter:					\$ 941.60
c. Travel:	426 miles ¹	x	\$0.56/mile	=	\$ 238.56
d. Parking:					\$ 7.00
d. Tolls:					\$ 5.25

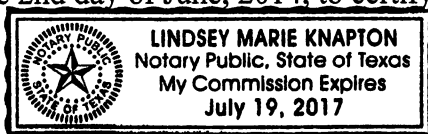
Total: \$ 5,707.41

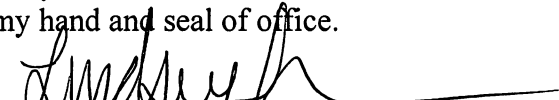
5. I spent 2.6 hours researching, drafting, and revising Plaintiffs' supplementation of evidence brief as to UTMB. At \$350/hr, this equates to \$910.
6. It is unknown at this time what fees and expenses may be associated with any additional depositions on the 14 noticed topics.

Further, Affiant sayeth not.


Sean Flammer

SUBSCRIBED and SWORN TO before me, by the said Sean Flammer, on this the 2nd day of June, 2014, to certify which witness my hand and seal of office.




Notary Public in and for the State of
Texas

¹ This is according to Google Maps, round-trip, from Edwards Law to the parking garage at UTMB Galveston and back.